



Selendy|Gay

April 8, 2024

Via ECF and E-mail

MEMO ENDORSED

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Letter Motion and Exhibits Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Plaintiffs' April 8, 2024 Letter Motion (the "Letter Motion") to File Public Versions of Plaintiffs' October 24, 2023 Motion for Leave to File a Second Amended Complaint (the "Motion") and Plaintiffs' proposed Second Amended Complaint (the "SAC") and to file exhibits to the Letter Motion under seal.

In compliance with the Court's order, dated December 18, 2023, at ECF No. 511, Plaintiffs have reached out to the Anonymous Trader seeking to compromise on redacting certain information in the Motion and SAC. Plaintiffs and the Anonymous Trader have reached impasse regarding the Court's orders and the proper redactions. Plaintiffs therefore seek to file the Letter Motion and the attached exhibits under seal in the first instance for the limited purpose of resolving this dispute.

Accordingly, Plaintiffs respectfully request leave to file Plaintiffs' Letter Motion and exhibits attached thereto under seal.

Hon. Katherine Polk Failla
April 8, 2024

Respectfully submitted,

/s/ Andrew R. Dunlap

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*Interim Lead Counsel and Attorneys for
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)

Application GRANTED. The Clerk of Court is directed to maintain docket entry 539 under seal, viewable to the Court and the parties only.

The Clerk of Court is directed to terminate the pending motion at docket entry 538.

Dated: April 9, 2024
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE